

NJID 822641

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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
ANTHONY R BROOKS, JR
SHERIE N BROOKS : CASE NO. 18-34018-JNP

Debtors : **NOTICE OF MOTION FOR
RELIEF FROM AUTOMATIC
STAY PURSUANT TO 11 USC
SECTION 362(d)**

ANTHONY R BROOKS, JR
712 SHERWOOD DRIVE
WILLIAMSTOWN, NJ 08094

BRAD J. SADEK, Esquire
1315 WALNUT STREET
STE 502
PHILADELPHIA, PA 19107

SHERIE N BROOKS
712 SHERWOOD DRIVE
WILLIAMSTOWN, NJ 08094

Isabel C. Balboa, Trustee
Cherry Tree Corporate Center
535 Route 38 - Suite 580
Cherry Hill, NJ 08002

U.S. Trustee
US Dept of Justice
Office of the US Trustee
One Newark Center Ste 2100
Newark, NJ 07102

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY (REAL PROPERTY)

WELLS FARGO BANK, N.A. (hereinafter 'Movant') has filed papers with the Court to have an Order entered granting it relief from the automatic stay against the property commonly known as 712 SHERWOOD DRIVE, WILLIAMSTOWN, NJ 08094.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the Court to grant Movant relief from the automatic stay regarding the above real property, or if you want the Court to consider your views on the Motion, then on or before 05/07/2019 you or your attorney must:

File with the Court a written response to Movant's Motion explaining your position. Your response must be filed with the Bankruptcy Clerk of the United States Bankruptcy Court, 400 Cooper Street, 4th Floor, Camden, NJ 08101.

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

/s/ Nicholas V. Rogers
Nicholas V. Rogers, Esq.
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
Tel: 856-813-5500 Ext. 42689
Fax: 856-813-5501
Email: nicholas.rogers@phelanhallinan.com

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If you are opposing the Order Movant is seeking from the Court, you must attend the hearing scheduled to be held on 05/14/2019 at 10:00 AM at the United States Bankruptcy Courthouse, 400 Cooper Street, 4th Floor, Courtroom 4C, Camden, NJ 08101, before the Honorable JERROLD N. POSLUSNY JR., presiding.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: April 15, 2019

/s/ Nicholas V. Rogers
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